

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LEON D. BLACK,

Plaintiff,

Case No.:
1:21-cv-08824-PAE

-against-

GUZEL GANIEVA, WIGDOR LLP, JOSH HARRIS,
AND STEVEN RUBENSTEIN,

Defendants.

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DECLARATION OF MAX GERSHENOFF

Max Gershenoff, pursuant to 28 U.S.C. § 1746, hereby declares the truth of the following:

1. I am a partner with the law firm of Rivkin Radler LLP, counsel for Defendant Wigdor LLP (“Wigdor”) in this action. I have personal knowledge of the facts set forth in this declaration, and would testify as to them in a court of law if required to do so.

2. I respectfully submit this declaration in support of Wigdor’s motion to dismiss.

3. Attached hereto as Exhibit “1” is a true and correct copy of Guzel Ganieva’s first amended complaint in Ganieva v. Black, Index No. 155262/2021 (Sup. Ct. N.Y. Cty.)

4. Attached hereto as Exhibit “2” is a true and correct of Leon D. Black’s initial answer, affirmative defenses, and counterclaims in Ganieva v. Black, Index No. 155262/2021 (Sup. Ct. N.Y. Cty.)

5. Attached hereto as Exhibit “3” is a true and correct copy of the July 19, 2021 Forbes magazine online article entitled “Leon Black Claims ‘Extortion’ By Russian Model: The Latest Scandal Plaguing The Epstein-Linked Billionaire, Explained”.

6. Attached hereto as Exhibit “4” is a true and correct copy of Guzel Ganieva’s proposed second amended complaint in Ganieva v. Black, Index No. 155262/2021 (Sup. Ct. N.Y. Cty.)

I declare under penalties of perjury that the foregoing is true and correct. Executed at Uniondale,
New York on March 4, 2022.

A handwritten signature in black ink, appearing to read 'Max Gershenoff', enclosed within a rectangular box.

Max Gershenoff